

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
	)	NO. 1:23-cr-10186-ADB
v.	)	
	)	
	)	
JOAN AVALO-QUEZADA	)	

**MOTION FOR RELASE FROM PRE-TRIAL CUSTODY AND  
REQUEST FOR A DETENTION HEARING**

Now comes the defendant, Joan Avalo-Quezada, before this Honorable Court, and respectfully moves for a detention hearing. As reasons and grounds therefore, the defendant states that the United States had moved for the defendant's detention and the defendant's detention was ordered without prejudice. The defendant now seeks release on pre-trial conditions and respectfully moves for a hearing on this motion. Defense counsel has consulted with the United States as to a convenient time for the hearing, and the defendant seeks a hearing on September 5, at 3:30.

Respectfully Submitted,

Counsel for the defendant,

*/s/ Jason Benzaken*

---

Jason Benzaken, Esq.  
Benzaken & Wood, LLP  
1342 Belmont Street, Suite 102  
Brockton, MA 02301  
(Tel) 508-897-0001  
(Fax) 508-587-5455  
BBO No. 658869  
*attorneybenzaken@gmail.com*

Dated: August 21, 2024

**Certificate of Service**

I hereby certify that a copy of this motion has been served upon the parties to this matter and counsel for the United States through CM/ECF.

/s/ Jason Benzaken

Dated: August 21, 2024